



## Privacy Policy

### **The Underdog Games Ltd**

The Underdog Games Ltd respects your trust in us to use, store, and share personal information responsibly. This Privacy Policy explains how we collect, use, store, and protect personal data in accordance with the General Data Protection Regulation (GDPR).

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### 1. Data Controller

The data controller is:

**The Underdog Games Ltd**

Email: [info@theunderdoggames.ie](mailto:info@theunderdoggames.ie)

Website: [www.theunderdoggames.ie](http://www.theunderdoggames.ie)

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### 2. What Personal Information We Collect

#### Parents / Guardians / Schools

When booking a child, children, or school programmes, we may collect:

- Name, address, email address, phone number
- Child's name, age, school, class in school
- Medical conditions, allergies, or special requirements

#### Staff & Job Applicants

When applying for work, we may collect:

- Name, address, email address, telephone number
- Qualifications and references
- First Aid qualifications
- Garda Vetting information
- Emergency contact details

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### 3. Legal Basis for Processing

We process personal data under the following lawful bases:

- **Contractual necessity** – to provide services or employment
- **Legal obligation** – safeguarding, insurance, tax, and employment law
- **Legitimate interests** – safe operation of camps and programmes
- **Consent** – marketing communications and optional participation
- **Vital interests** – medical emergencies

Special category data (such as medical or safeguarding data) is processed only where strictly necessary and with appropriate safeguards.

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## 4. How We Use Personal Information

We may use personal information to:

1. Deliver programmes and services
2. Meet safeguarding and legal obligations
3. Garda vet staff and complete reference checks
4. Respond to enquiries and correspondence
5. Improve services and programme delivery
6. Administer employment and staff management
7. Contact customers regarding seasonal updates, offers, and events (with opt-out available)

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## 5. How We Protect Your Information

We apply appropriate technical and organisational security measures to protect personal data from unauthorised access, loss, misuse, or disclosure.

- Payment transactions are processed securely through Stripe and are not stored on our servers
- Access to sensitive data is restricted to authorised personnel only

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## 6. Data Sharing

Personal data may be shared only where necessary with:

- Gardaí or Tusla (Child and Family Agency)
- Medical professionals in emergencies
- Insurance providers
- Payment processors
- Legal or regulatory authorities where required by law

We never sell personal data.

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## 7. Data Retention

We retain personal data only for as long as necessary:

- Booking and customer records: up to **7 years**
- Employment and staff records: up to **7 years after employment ends**
- Garda Vetting and safeguarding records: in line with legal requirements
- Marketing data: until consent is withdrawn

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## 8. Children's Data

We recognise that children's personal data requires enhanced protection. We only collect and process children's data where necessary for programme delivery, safeguarding, and safety, and we apply strict access controls.

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## 9. Your Data Protection Rights

You have the right to:

- Access your personal data
- Request correction or deletion
- Restrict or object to processing
- Withdraw consent at any time
- Request data portability

Requests can be made by emailing: [info@theunderdoggames.ie](mailto:info@theunderdoggames.ie)

You also have the right to lodge a complaint with the **Data Protection Commission (Ireland)**.

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## 10. Updates and Review

This Privacy Policy is reviewed regularly and may be updated to reflect legislative or operational changes. The most current version will always be available on our website.